

EXHIBIT A



**Service of Process
Transmittal**

01/15/2019

CT Log Number 534736958

TO: Renee Simonton, President
RELX Inc.
1105 N MARKET ST STE 501
WILMINGTON, DE 19801-1253

RE: Process Served in Wisconsin

FOR: LexisNexis Risk Solutions Inc. (Domestic State: GA)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Gary Bahr and Sarah Haas, Pltfs. vs. LexisNexis Risk Solutions, Inc., Dft.

DOCUMENT(S) SERVED: SUMMONS, COMPLAINT, EXHIBITS

COURT/AGENCY: St. Croix County Circuit Court, WI
Case # 2019CV000014

NATURE OF ACTION: REQUEST FOR RELIEF

ON WHOM PROCESS WAS SERVED: C T Corporation System, Madison, WI

DATE AND HOUR OF SERVICE: By Process Server on 01/15/2019 at 12:20

JURISDICTION SERVED : Wisconsin

APPEARANCE OR ANSWER DUE: Within 20 days of receiving this summons

ATTORNEY(S) / SENDER(S): Eric L. Crandall
CRANDALL LAW FIRM, SC
421 West Second Street
PO BOX 2746
New Richmond, WI 54017
715-243-9996

ACTION ITEMS: CT has retained the current log, Retain Date: 01/16/2019, Expected Purge Date: 01/21/2019

Image SOP

Email Notification, Renee Simonton renee.simonton@relx.com

Email Notification, Julie Goldweitz julie@reilaw.com

Email Notification, Jacqueline Gregorski jacqueline.gregorski@relx.com

SIGNED: C T Corporation System

ADDRESS: 301 S. Bedford St.
Suite 1
Madison, WI 53703

TELEPHONE: 302-658-7581/7582/7583

FILED
01-09-2019
Circuit Court
St. Croix County, WI
2019CV000014
Honorable Edward Vlack
Branch 2

STATE OF WISCONSIN

CIRCUIT COURT

COUNTY OF SAINT CROIX

Gary Bahr,
Sarah Haas,

Civil File No. _____

Plaintiffs,

vs.

LexisNexis Risk Solutions, Inc.,
a foreign corporation,

Defendant.

1-15-19
11:40A
[Signature]

SUMMONS

**THE STATE OF WISCONSIN
TO EACH PERSON OR ENTITY NAMED ABOVE AS A DEFENDANT**

You are hereby notified that the Plaintiff named above have filed a lawsuit or other legal action against you. The complaint, which is attached, states the nature and basis of the legal action.

Within twenty (20) days of receiving this summons, you must respond with a written answer to the complaint, as the term is used in chapter 802 of the Wisconsin Statutes. The court may reject or disregard an answer that does not follow the requirements of the statutes. The answer must be electronically filed, or sent or delivered to the court, whose address is Clerk of Circuit Court, Saint Croix County Courthouse, 1101 Carmichael Road, Hudson, Wisconsin 54016, and a copy sent or delivered to Plaintiff's attorney, Eric L. Crandall, Esq., Crandall Law Firm, SC., whose address is 421 West Second Street, PO Box 27, New Richmond, WI 54017 You may have an attorney help or represent you.

If you do not provide a proper answer within twenty (20) days, the court may grant judgment against you for the award of money or other legal action requested in the complaint, and you may lose your right to object to anything that is or may be incorrect in the complaint. A judgment may be enforced as provided by law. A judgment awarding money may become a lien against any real estate you own now or in the future, and may also be enforced by garnishment or seizure of property.

DATED: January 9, 2019

Electronically signed by Eric Crandall

Eric L. Crandall, Esq.

CRANDALL LAW FIRM, SC

421 West Second Street

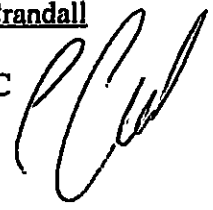
PO Box 27

New Richmond, WI 54017

715-243-9996 (p)

WisconsinConsumerLaw@frontier.com

Wis. Attorney Lic. No. 1001833



ATTORNEY FOR PLAINTIFF

FILED
01-09-2019
Circuit Court
St. Croix County, WI
2019CV000014
Honorable Edward Vlack
Branch 2

STATE OF WISCONSIN

CIRCUIT COURT

COUNTY OF SAINT CROIX

Gary Bahr,
Sarah Haas,

Civil File No. _____

Plaintiffs,

vs.

LexisNexis Risk Solutions, Inc.,
a foreign corporation,

Defendant.

COMPLAINT AND DEMAND FOR JURY TRIAL

I. PRELIMINARY STATEMENT

1. Plaintiffs bring this action for damages based upon Defendant LexisNexis Risk Solutions, Inc.'s (LexisNexis) violations of the Fair Credit Reporting Act, 15 U.S.C. §1681, *et seq.* (hereinafter referred to as the "FCRA" or "Act"). Plaintiffs seek actual damages, statutory damages, punitive damages, costs, and attorney fees.

II. JURISDICTION AND VENUE

2. Jurisdiction of this court arises under Wis. Stat. § 801.04 (general), and Wis. Stat. § 801.05 (long arm), as well as 15 U.S.C. §1681p (FCRA).
3. Venue in this court is appropriate under Wis. Stat. § 801.50 (general venue), as a substantial part of the events giving rise to the claims asserted by Plaintiffs arose in this county.

III. PARTIES

4. Each named plaintiff is a natural persons and is a current or former resident and citizen of the State of Wisconsin, and of the United States.
5. Each named plaintiff is a "consumer" as defined by §1681a(c) of the Act.
6. Each named plaintiff is concerned with the privacy of his or her personal information.
7. Each named plaintiff ordered his or her driving record from the Wisconsin Department of Transportation, division of Motor Vehicles, and learned from the Department that his or her driving record had been accessed, downloaded and obtained by LexisNexis.
8. Each named plaintiff subsequently ordered his or her credit report from LexisNexis.
9. Defendant LexisNexis is a foreign corporation licensed to do business in Wisconsin, and has designated CT corporation system as its registered agent.
10. LexisNexis is a consumer reporting agency as defined by §1681a(f) of the Act, and is regularly engaged in the business of assembling, evaluating, and dispersing information concerning consumers credit, to third parties.
11. LexisNexis dispenses such consumer reports to third parties under contract for monetary compensation.

IV. FACTUAL ALLEGATIONS

Gary Bahr

12. In a letter dated May 31, 2017 but mailed June 2, 2017, Bahr ordered and requested a copy of his consumer credit report from LexisNexis. A redacted copy of the relevant portions of this request is attached as exhibit A.

13. By operation of 15 U.S.C. § 1681j(a)(2), LexisNexis was required to forward a copy of Bahr's consumer credit report to him or his agent within 15 days.
14. At no time has LexisNexis notified Bahr or his legal counsel that it has experienced or was experiencing either a "high request volume" or an "extraordinary request volume" of requests for copies of consumer credit reports. See 12 C.F.R. § 1022.136 (e)(excluding compliance with 15 day rule in narrow circumstances).
15. LexisNexis never forwarded a copy of Bahr's credit report, making the violation of the FCRA an ongoing violation that now exceeds 365 days.
16. Accordingly, LexisNexis violated and breached its duty under 15 U.S.C. § 1681j(a)(2).
17. LexisNexis violation and breach of its duty under 15 U.S.C. § 1681j(a)(2) was willful, as LexisNexis habitually violate the 15 day rule of 15 U.S.C. § 1681j(a)(2). Plaintiff and his counsel are aware of over 15 other instances where LexisNexis similarly breached its duty under 15 U.S.C. § 1681j(a)(2).
18. As a result of Defendant's actions, Plaintiff has suffered and is entitled to recover damages.

Sarah Haas

19. On May 31, 2017, Haas ordered and requested a copy of her consumer credit report from LexisNexis. A redacted copy of the relevant portions of this request is attached as exhibit B.
20. By operation of 15 U.S.C. § 1681j(a)(2), LexisNexis was required to forward a copy of Haas' consumer credit report to her or her agent within 15 days.

21. At no time has LexisNexis notified Haas or her legal counsel that it has experienced or was experiencing either a "high request volume" or an "extraordinary request volume" of requests for copies of consumer credit reports. See 12 C.F.R. § 1022.136 (e)(excluding compliance with 15 day rule in narrow circumstances).
22. LexisNexis forwarded a copy of Haas credit report in a letter dated November 20, 2017, but postmarked Dec. 21, 2017, over 150 days past the FCRA deadline.
23. Accordingly, LexisNexis violated and breached its duty under 15 U.S.C. § 1681j(a)(2).
24. LexisNexis violation and breach of its duty under 15 U.S.C. § 1681j(a)(2) was willful, as LexisNexis habitually violate the 15 day rule of 15 U.S.C. § 1681j(a)(2). Plaintiff and her counsel are aware of over 15 other instances where LexisNexis similarly breached its duty under 15 U.S.C. § 1681j(a)(2).
25. As a result of Defendant's actions, Plaintiff has suffered and is entitled to recover damages.

V. CLAIM FOR RELIEF

COUNT I. FAIR CREDIT REPORTING ACT

26. Plaintiffs incorporate by reference all the foregoing paragraphs.
27. LexisNexis willfully violated provisions of the Fair Credit Reporting Act. LexisNexis's violations include, but are not limited to the following:
 - (a) LexisNexis violated 15 U.S.C. § 1681j(a)(2) by willfully failing to provide each plaintiff with a copy of his or her consumer report within 15 days of his or her request.
28. As a result of the above violations of the FCRA, LexisNexis is liable to each plaintiff for actual damages, statutory damages, punitive damages, costs, disbursements, and reasonable attorney's fees.

VI. REQUEST FOR RELIEF


29. **WHEREFORE**, Plaintiffs respectfully requests that Judgment be entered against Defendant in the amount of:

- (a) actual damages;
- (b) punitive damages;
- (c) statutory damages of \$1,000.00 per violation;
- (d) costs and reasonable attorney's fees; and
- (e) such other and further relief as the court deems just and equitable.

VII. DEMAND FOR TRIAL BY JURY

30. Plaintiffs hereby demand that, to the extent provided by the United States and Wisconsin Constitutions, United States and Wisconsin Statutes and United States and Wisconsin Common Law, these claims be determined by a jury of their peers.

DATED: January 9, 2019


s/ Eric Crandall
Eric L. Crandall, Esq.
CRANDALL LAW FIRM, SC
421 West Second Street
PO Box 27
New Richmond, WI 54017
715-243-9996 (p)
715-246-3793 (f)
WisconsinConsumerLaw@frontier.com
Wis. Attorney Lic. No. 1001833

ATTORNEY FOR PLAINTIFFS

EXHIBIT A

CRANDALL LAW OFFICE

421 WEST SECOND STREET
P.O. BOX 27
NEW RICHMOND, WI 54017

TELEPHONE: (715) 246-1010

Licensed To Practice Law in Wisconsin

FACSIMILE: (715) 246-3793

May 31, 2017

LexisNexis Consumer Center
PO Box 105108
Atlanta, GA 30348

RE: Gary Lee Bahr, Jr.

DOB: [REDACTED]

SSN#: [REDACTED]

DL # [REDACTED]

Address: [REDACTED]
[REDACTED]
[REDACTED]

Sir/Madame

I represent Gary Lee Bahr, Jr., relative to his rights under all applicable state and federal law, including but not limited to the Fair Credit Reporting Act (FCRA), 15 USC § 1681, et. seq., and the Driver's Privacy Protection Act (DPPA), 18 U.S.C. § 2721, et. seq. I enclose a copy of an authorization executed by my client, and copies of my client's driver's license and social security card for your convenience. I also enclose a May 19, 2017 letter from the Wisconsin Department of Motor Vehicles, indicating that your company acquired Mr. Bahr's records on one occasion in 2011.

Once again, pursuant to all applicable law, including but not limited to the FCRA and the DPPA, please review your records and forward the following information and documentation to me:

- * information and documentation relating to your companies purchase of information and data from Mr. Bahr's Wisconsin driving record, including from whom you purchased the information and data, the information and data you actually received, and the relevant dates for each;
- * information and documentation relating to your companies sale of information and data from Mr. Bahr's Wisconsin driving record, including to whom you sold the information and data, the information and data you actually sold, and the relevant dates for each;

[REDACTED]

- * information and documentation relating to any express consent that Mr. Bahr gave the Department of Transportation in Wisconsin to share information and data from Wisconsin driving record with third parties;
- * when and to whom did your organization sell information and data from Mr. Bahr's Wisconsin driving record, and what information and documentation did you sell;
- * what information, documents and data from Mr. Bahr's Wisconsin driving record do you currently retain; and
- * a complete and accurate copy of Mr. Bahr's consumer report, including all information you have obtained from the Wisconsin Department of Transportation and its motor vehicles division.

Please note the FCRA's definition of consumer report, 15 U.S.C. § 1681a(d)(1) includes any database which includes a consumer's "personal characteristics." Because the data your organization obtained from the Wisconsin Department of Transportation and its motor vehicles division includes "personal characteristics" such as height, weight, hair and eye color, and date of birth, the information and documentation in your database necessarily constitutes a "consumer report" under the FCRA, Mr. Bahr has the right to a copy, and failure to honor this request will lead to liability under the FCRA, 15 U.S.C. § 1681n.

Thank you in advance for your attention, cooperation, and courtesy in this matter.

Sincerely,



Eric L. Crandall, Esq.

CRANDALL LAW OFFICE

ELC/

enclosures

via US mail - delivery confirmation

cc: client (w/ encl., via US mail)

Buk-
hobillh

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NEW RICHMOND
430 S KNOWLES AVE
NEW RICHMOND
WI
54017-1733
5659500896
06/02/2017 (800)275-8777 9:08 AM
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Product Description	Sale Qty	Final Price
PM 2-Day Window FR Env (Domestic) (ATLANTA, GA 30348) (Flat Rate) (Expected Delivery Day) (Monday 06/05/2017) (USPS Tracking #) (9505 5156 1258 7153 174 92)	1	\$6.65
Insurance (Up to \$50.00 In.)	1	\$0.00
Total		\$6.65
Cash		\$7.00
Change		(\$0.35)

Includes up to \$50 insurance

BRIGHTEN SOMEONE'S MAILBOX. Greeting cards available for purchase at select Post Offices.

Text your tracking number to 28777
(2USPS) to get latest status.
Standard Mail rates may vary. Visit USPS.com for more information.
2022-1811.

USPS Tracking® Results

FAQs > (<http://faq.usps.com/?articleId=220900>)

Track Another Package +

Remove X

Tracking Number: 9505515612587153117492



Delivered

On Time

Updated Delivery Day: Monday, June 5, 2017 ⓘ

Product & Tracking Information

See Available Actions

Postal Product:
Priority Mail™

Features:
Insured
USPS Tracking®

DATE & TIME	STATUS OF ITEM	LOCATION
June 5, 2017, 7:12 am	Delivered, To Agent	ATLANTA, GA 30348

▲
Your item has been delivered to an agent at 7:12 am on June 5, 2017 in ATLANTA, GA 30348.

June 5, 2017, 6:57 am	Arrived at Post Office	ATLANTA, GA 30304
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June 5, 2017, 4:04 am	In Transit to Destination	
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DATE & TIME	STATUS OF ITEM	LOCATION
June 4, 2017 4:04 am	Arrived at USPS Destination Facility	ATLANTA, GA 30369

See More 

Available Actions

Text Updates 

Email Updates 

See Less 

Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

FAQs (<http://faq.usps.com/?articleId=220900>)

EXHIBIT B

CRANDALL LAW OFFICE

421 WEST SECOND STREET
P.O. BOX 27
NEW RICHMOND, WI 54017

TELEPHONE: (715) 246-1010

Licensed To Practice Law in Wisconsin

FACSIMILE: (715) 246-3793

May 31, 2017

LexisNexis Consumer Center
PO Box 105108
Atlanta, GA 30348

RE: Sarah Ann Haas

DOB: [REDACTED]

SSN#: [REDACTED]

DL: [REDACTED]

Address: [REDACTED]
[REDACTED]

Sir/Madame

I represent Sarah Ann Haas, relative to her rights under all applicable state and federal law, including but not limited to the Fair Credit Reporting Act (FCRA), 15 USC § 1681, et. seq., and the Driver's Privacy Protection Act (DPPA), 18 U.S.C. § 2721, et. seq. I enclose a copy of an authorization executed by my client, and copies of my client's driver's license and social security card for your convenience. I also enclose an April 14, 2017 letter from the Wisconsin Department of Motor Vehicles, indicating that your company acquired Ms. Haas's records on four occasions between 2014 and 2017, as well as my April 24, 2017 letter that your company never responded to.

Once again, pursuant to all applicable law, including but not limited to the FCRA and the DPPA, please review your records and forward the following information and documentation to me:

- * information and documentation relating to your companies purchase of information and data from Ms. Haas's Wisconsin driving record, including from whom you purchased the information and data, the information and data you actually received, and the relevant dates for each;
- * information and documentation relating to your companies sale of information and data from Ms. Haas's Wisconsin driving record, including to whom you sold the information and data, the information and data you actually sold, and the relevant dates for each;
- * information and documentation relating to any express consent that Ms. Haas gave the

[REDACTED]

Department of Transportation in Wisconsin to share information and data from Wisconsin driving record with third parties;

- * when and to whom did your organization sell information and data from Ms. Haas's Wisconsin driving record, and what information and documentation did you sell;
- * what information, documents and data from Ms. Haas's Wisconsin driving record do you currently retain; and
- * a complete and accurate copy of Ms. Haas's consumer report, including all information you have obtained from the Wisconsin Department of Transportation and its motor vehicles division.

Please note the FCRA's definition of consumer report, 15 U.S.C. § 1681a(d)(1) includes any database which includes a consumer's "personal characteristics." Because the data your organization obtained from the Wisconsin Department of Transportation and its motor vehicles division includes "personal characteristics" such as height, weight, hair and eye color, and date of birth, the information and documentation in your database necessarily constitutes a "consumer report" under the FCRA, Ms. Haas has the right to a copy, and failure to honor this request will lead to liability under the FCRA, 15 U.S.C. § 1681n.

Thank you in advance for your attention, cooperation, and courtesy in this matter.

Sincerely,



Eric L. Crandall, Esq.

CRANDALL LAW OFFICE

ELC/

enclosures

via US mail - delivery confirmation

cc: client (w/ encl., via US mail)

5-31-2017

Let's

Huan

Gumich

Georg

Binkley

v. Myers

Highland

Haupt

Haupt

NEW RICHMOND
430 S KNOWLES AVE
NEW RICHMOND
WI
54017-1733
5659500896
05/31/2017 (800)275-8777 2:31 PM

Product Description	Sale Qty	Final Price
PM 2-Day (Domestic) (ATLANTA, GA 30348) (Weight: 0 Lb 7.40 Oz) (Expected Delivery Day) (Friday 06/02/2017) (USPS Tracking #) (9505 5156 1258 7151 1169 1b)	1	\$7.40
Insurance (Up to \$50.00 included)	1	\$0.00
Total		\$7.40
Cash		\$8.00
Change		(\$0.60)

Included up to \$50 Insurance

USPS Tracking® Results

FAQs > (<http://faq.usps.com/?articleId=220900>)

Track Another Package +

Remove X

Tracking Number: 9505515612587151116916



Delivered

On Time

Updated Delivery Day: Friday, June 2, 2017 ⓘ

Product & Tracking Information

See Available Actions

Postal Product:
Priority Mail™

Features:
Insured
USPS Tracking®

DATE & TIME	STATUS OF ITEM	LOCATION
June 2, 2017, 7:02 am	Delivered, To Agent	ATLANTA, GA 30348
Your item has been delivered to an agent at 7:02 am on June 2, 2017 in ATLANTA, GA 30348.		
June 2, 2017, 6:40 am	Arrived at Post Office	ATLANTA, GA 30304
June 2, 2017, 5:32 am	Arrived at USPS Destination Facility	ATLANTA, GA 30320



LexisNexis® Consumer Center
Consumer Number: 10551345

November 20, 2017

ERIC L CRANDALL ESQ
ATTORNEY AT LAW AND CRANDALL LAW OFFICES, SC
1237 KNOWLES AVE NORTH
PO BOX 27
NEW RICHMOND, WI 54017

We received your letter dated May 31, 2017 concerning the information on your client, Sarah Ann Haas.

We have located your client's consumer reports and those reports are enclosed.

If you have any further questions you may contact the LexisNexis Consumer Center via email at consumer.documents@LexisNexis.com or by phone at 888-497-0011. The LexisNexis Risk Solutions Consumer Center's hours of operation are Monday – Friday from 8:00 A.M. to 7:00 P.M. Eastern Time. In an effort to protect your privacy and deliver prompt service, please have the numbers located at the top of this page accessible when you call our support number.

Thank you for allowing us the opportunity to assist you.

LexisNexis Consumer Center
P.O. Box 105108
Atlanta, GA 30348-5108

Page 22 of 22



LexisNexis®

Consumer Service Center
P.O. Box 105108
Atlanta, Georgia 30348-5108

PRESORTED
FIRST CLASS

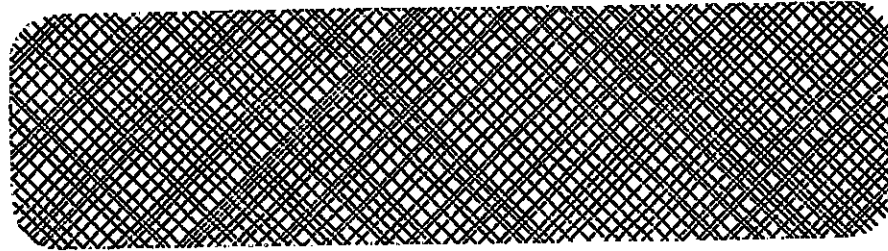


U.S. POSTAGE >> PITNEY BOWES



ZIP 30005 \$ 000.40³
02 4W
G000346003 DEC 21 2017

12/22/2017



Filed 01-09-2019

Document 1

Case 2019CV000014

STATE OF WISCONSIN

CIRCUIT COURT

ST CROIX COUNTY

Gary Bahr Jr. et al vs. LexisNexis Risk Solutions, Inc.

**Electronic Filing
Notice**

Case No. 2019CV000014
Class Code: Money Judgment

FILED
01-09-2019
Circuit Court
St. Croix County, WI
2019CV000014
Honorable Edward Vlack
Branch 2

LEXISNEXIS RISK SOLUTIONS, INC.
PO BOX 105108
ATLANTA GA 30348

Case number 2019CV000014 was electronically filed with/converted by the St Croix County Clerk of Circuit Court office. The electronic filing system is designed to allow for fast, reliable exchange of documents in court cases.

Parties who register as electronic parties can file, receive and view documents online through the court electronic filing website. A document filed electronically has the same legal effect as a document filed by traditional means. Electronic parties are responsible for serving non-electronic parties by traditional means.

You may also register as an electronic party by following the instructions found at <http://efiling.wicourts.gov/> and may withdraw as an electronic party at any time. There is a \$ 20.00 fee to register as an electronic party.

If you are not represented by an attorney and would like to register as an electronic party, you will need to enter the following code on the eFiling website while opting in as an electronic party.

Pro Se opt-in code: 7a6a9e

Unless you register as an electronic party, you will be served with traditional paper documents by other parties and by the court. You must file and serve traditional paper documents.

Registration is available to attorneys, self-represented individuals, and filing agents who are authorized under Wis. Stat. 799.06(2). A user must register as an individual, not as a law firm, agency, corporation, or other group. Non-attorney individuals representing the interests of a business, such as garnishees, must file by traditional means or through an attorney or filing agent. More information about who may participate in electronic filing is found on the court website.

If you have questions regarding this notice, please contact the Clerk of Circuit Court at 715-386-4630 Ext. 4633.

St Croix County Circuit Court
Date: January 9, 2019